

HON. KYMBERLY K. EVANSON

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

REC ROOM, INC.,

Plaintiff,

v.

M.Z.,

Defendant.

No. 2:23-cv-01586

**UNOPPOSED JOINT MOTION TO  
STAY PROCEEDINGS**

NOTE ON MOTION CALENDAR:  
April 9, 2025

Plaintiff Rec Room, Inc. (“Plaintiff”) and Defendant M.Z. (“Defendant”), collectively “The Parties,” hereby respectfully and jointly request that the Court enter an Order staying all proceedings in this litigation for two months to permit parties to focus on settlement negotiations. In support of this joint motion, the parties state as follows:

**UNOPPOSED JOINT MOTION  
TO STAY PROCEEDINGS – 1**  
(Case No. 2:23-cv-01586-KKE)

**Miller Nash LLP**  
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- 1 1. Parties have been conducting discovery pursuant to the Court's September 10, 2024
- 2 Scheduling Order.
- 3
- 4 2. The Parties have been in contact with regards to a possible settlement of this action.
- 5
- 6 3. On March 27, counsel for Plaintiff and Defendant conferred to discuss the possibility of
- 7 a settlement.
- 8
- 9 4. The Parties agree to continue negotiating in good faith toward a resolution of this action.
- 10
- 11 5. The Parties agree that it will promote judicial economy and limit costs if further litigation
- 12 of this matter is stayed pending continuing settlement discussions between the Parties.
- 13
- 14 6. The Parties further agree that neither party will be prejudiced if this action is stayed for
- 15 two months.

16 Therefore, the Parties respectfully request a stay of all further proceedings and deadlines  
17 until May 26, 2025, including the deadlines for discovery motions and the completion of  
18 discovery. The Parties jointly request deadline for the close of discovery be moved accordingly  
19 to July 25, 2025. The Parties stipulate that none of the Parties shall construe any Order issued in  
20 response to the Parties' Joint Motion to Stay Proceedings as addressing the materiality of any  
21 issue, or urgency or necessity of any claim in the Complaint. The Parties also stipulate to file a  
22 joint status update with the Court on May 15, 2025.

23 Counsel for Defendant review and approved the text of this Motion on April 8, 2025.

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**UNOPPOSED JOINT MOTION TO  
TO STAY PROCEEDINGS – 2**  
(Case No. 2:23-cv-01586-KKE)

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1 Dated: April 9, 2025  
2  
3  
4  
5

/s/ Brian Esler

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/s/ Dylan M. Schmeyer

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*Attorneys for Plaintiff Rec Room, Inc.*

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**UNOPPOSED JOINT MOTION TO  
TO STAY PROCEEDINGS – 3**  
(Case No. 2:23-cv-01586-KKE)

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**ORDER**

IT IS SO ORDERED. All further proceedings and deadlines are stayed until May 26, 2025, including the deadlines for discovery motions and the completion of discovery. The close of discovery shall be moved accordingly to July 25, 2025. The Parties shall file a joint status update with the Court on May 15, 2025.

ORDERED this \_\_\_\_ day of \_\_\_\_\_, 2025.

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Kymberly K. Evanson  
United States District Judge